

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

JJ IMPORTS, LLC,

Plaintiff,

v.

QINGDAO ECOPURE FILTER CO., LTD.,  
et al.

Defendants.

Civil Action No. 2:19-cv-16248-KM-JBC

**NOTICE OF MOTION**

Motion Date: December 16, 2019

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that defendants, Qingdao Ecopure Filter Co., Ltd. (“Ecopure”), HongKong Ecoaqua Co. (“Ecoaqua”), and Ecolife Technologies, Inc. (“Ecolife”), through its attorneys, Fishkin Lucks LLP, will move this Court before the Honorable Kevin McNulty, U.S.D.J., at the United States District Court for the District of New Jersey, Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, on December 16, 2019 at 9:00 a.m., or as soon thereafter as the matter may be heard, for an order dismissing with prejudice pursuant to Fed. R. Civ. P. 12(b)(2), the complaint of plaintiff JJ Imports, LLC for lack of personal jurisdiction.

In support of its motion, Ecopure, Ecoqua, and Ecolife rely upon the annexed memorandum of law and declaration of Kathy Wang, both dated November 13, 2019.

Dated: November 13, 2019

s/ Zachary W. Silverman  
Zachary W. Silverman  
FISHKIN LUCKS LLP  
One Riverfront Plaza, Suite 410  
Newark, NJ 07102  
973.536.2800  
zsilverman@fishkinluck.com

and

Todd R. Tucker\*  
Joshua M. Ryland\*  
Yizhou Liu\*  
Alexandra R. Forkosh\*  
CALFEE, HALTER & GRISWOLD LLP  
The Calfee Building  
1405 East Sixth Street  
Cleveland, OH 44114  
216.622.8231  
ttucker@calfee.com  
jryland@calfee.com  
bliu@calfee.com  
aforkosh@calfee.com  
\* to move for admission *pro hac vice*

Attorney for Defendants